USA Comments AAHC REPORT - AUGUST 2005

CHAPTER 2.1.14. GYRODACTYLOSIS (Gyrodactylus salaris) Article 2.1.14.3. **Commodities** 1. When authorising import or transit of the following *commodities*, *Competent* Authorities should not require any Gyrodactylosis related conditions, regardless of the Gyrodactylosis status of the *exporting country*, *zone* or *compartment*: a) For the species in Article 2.1.14.2. for any purpose: i) ... ii) ... b) The following products destined for human consumption from species in Article 2.1.14.2 which have been prepared in such a way to minimise the risk of diversion for alternative uses: Chemically Preserved products (e.g. smoked, salted, pickled, marinated, etc ...); ii) ... iii) ... iv) ... v) ... c) 2. When considering the import or transit of any live *commodity* of a species not listed in Article 2.1.14.2. from an exporting country, zone or compartment not declared free of Gyrodactylosis, Competent Authorities of the importing country should conduct an analysis of the risk of introduction, establishment and spread of G. salaris, and the potential consequences, associated with importation of the commodity, prior to a decision. The outcome of this assessment should be made

available to the *exporting country*.

Rationale:

Article 2.1.14.3 1)b)i): Smoking and freeze drying are physical (not chemical) processes.

Article 2.1.14.3 3): No comma needed after "...and the potential consequences..."

Article 2.1.14.4.

Gyrodactylosis free country

A country may declare itself free from Gyrodactylosis if it meets the conditions in points 1), 2), 3) or 4) below.

If a country shares a *zone* or *compartment* with one or more other countries, it can only declare itself an-a Gyrodactylosis free country if all the areas covered by the shared water are declared Gyrodactylosis free countries or zones (see Article 2.1.14.5.).

Note: same syntax error ("an" vs. "a") occurs in Article 2.1.14.5)

Article 2.1.14.7.

Importation of live animals from a country, zone or compartment declared free from Gyrodactylosis

. . . .

The certificate shall should be in accordance with the Model Certificate in Appendix 6.1.1..

Comment: Recommend replacing the word "shall" with "should" as it is a more appropriate term when referring to a recommended procedure.

Article 2.1.14.9.

Importation of live animals for processing for human consumption from a country, zone or compartment not declared free from Gyrodactylosis

When importing, for processing for human consumption, *aquatic animals* of the species listed in Article 2.1.14.2., other than any live *commodities* listed in paragraph 1) of Article 2.1.14.3., from a country, *zone* or *compartment* not declared free from Gyrodactylosis, the *Competent Authority* of the *importing country* should require:

1. a certificate from the *Competent Authority* of the *exporting country* (**italicize**) stating that the fish have been held, immediately prior to export, in water with a salinity of at least 25 parts per thousand for a continuous period of at least 14 days.

OR

- 2. a) the consignment is delivered directly to and held in *quarantine* facilities for slaughter and processing to one of the products listed in paragraph 1 of Article 2.1.14.3. or other products authorised by the *Competent Authority* (italicize); and
 - b) all effluent and waste material are treated in a manner that ensures inactivation of *G. salaris*.

Article 2.1.14.9.bis

Importation of live animals intended for use in animal feed, or for agricultural, industrial or pharmaceutical use from a country, zone or compartment not declared free from Gyrodactylosis

When importing, for use in animal feed, or for agricultural, industrial or pharmaceutical use, *aquatic animals* of the species listed in Article 2.1.14.2., other than any live *commodities* listed in paragraph 1) of Article 2.1.14.3., from a country, *zone* or *compartment* not declared free from Gyrodactylosis, the *Competent Authority* of the *importing country* should require:

1. a certificate from the *Competent Authority* of the *exporting country* (**italicize**) stating that the fish have been held, immediately prior to export, in water with a salinity of at least 25 parts per thousand for a continuous period of at least 14 days.

OR

- 2. a) the consignment is delivered directly to and held in *quarantine* facilities for slaughter and processing to one of the products listed in paragraph 1 of Article 2.1.14.3. or other products authorised by the *Competent Authority* (italicize); and
 - b) all effluent and waste material are treated in a manner that ensures inactivation of *G. salaris*.

Article 2.1.14.10.

Importation of products from a country, zone or compartment declared free from Gyrodactylosis

When importing *aquatic animal products* of the species listed in Article 2.1.14.2., other than those *commodities* listed in point 1) of Article 2.1.14.3., from a country, *zone* or *compartment* free from Gyrodactylosis, the *Competent Authority* of the *importing country* should require an *international aquatic animal health certificate* issued by the *Competent Authority* of the *exporting country* or a *certifying official* approved by the *importing country* certifying that, on the basis of the procedures described in Articles 2.1.14.4. or 2.1.14.5. (as applicable), the place of production of the consignment is a country, *zone* or *compartment* declared free from Gyrodactylosis.

The certificate shall should be in accordance with the Model Certificate in Appendix 6.2.1..

Comment: Recommend replacing the word "shall" with "should" as it is a more appropriate term when referring to a recommended procedure.

Article 2.1.14.11.

Importation of products from a country, zone or compartment not declared free from Gyrodactylosis

When importing *aquatic animal products* of the species listed in Article 2.1.14.2., other than those *commodities* listed in point 1) of Article 2.1.14.3., from a country, *zone* or *compartment* not declared free from Gyrodactylosis, the *Competent Authority* of the *importing country* should assess the risk and apply appropriate risk mitigation measures.

In the case of dead fish, whether eviscerated or uneviscerated, such risk mitigation measures may include:

- a) the consignment is delivered directly to and held in biosecure/quarantine facilities for processing to one of the products listed in paragraph 1 of Article 2.1.14.3. or other products authorised by the *Competent Authority* (italicize); and
- b) all effluent and waste material are treated in a manner that ensures inactivation of *G. salaris*;

OR

c) the *Competent Authority* of the *importing country* should require a certificate from the *Competent Authority* of the *exporting country* attesting that the product was derived from fish which had been held, immediately prior to processing, in water with a salinity of at least 25 parts per thousand for a continuous period of 14 days.